

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, NJ 08038 609 339-4800 Richard A. Uderitz Vice President — Nuclear

January 20, 1984

U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Attention: Mr. Richard W. Starostecki, Director Division of Project and Resident Programs

Gentlemen:

SUPPLEMENTAL RESPONSE NRC INSPECTION 50-311/83-15 SALEM GENERATING STATION NO. 2 UNIT DOCKET NO. 50-311

BUTPSOO

The subject inspection conducted on May 11 to June 8, 1983, identified an apparent violation involving the failure to maintain the minimum two AC electrical bus trains and their associated diesel generators or to establish containment integrity within the required time. PSE&G's response is provided below.

ITEM OF VIOLATION

Technical Specification 3.8.2.2 requires that as a minimum two AC electrical bus trains shall be energized and that their associated diesel generators shall be operable in Mode 5 and 6. The AC electrical bus train shall include the 115 volt instrument bus energized from its respective inverter connected to its respective DC bus train. With less than the required complement of AC buses and inverters operable and energized containment integrity must be established within eight hours.

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9402070253 840202 PDR ADOCK 05000311 Q PDR Contrary to the above:

While in Mode 5 from 8:25 p.m. until 9:27 p.m. on May 25, 1983 and from 8:43 a.m. until 11:45 a.m. on May 30, 1983 only B AC electrical bus train and B diesel generator were operable with 2A diesel generator and 2C vital instrument bus inverter out of service for maintenance in excess of eight hours without establishing containment integrity.

Reply to Item of Violation

On May 25, 1983, with 2A diesel generator inoperable due to extensive outage maintenance, 2C vital instrument bus inverter was removed from service for modifications. The work was estimated to take 3 hours based upon previous experience. The above actions made 2 AC bus trains inoperable which was permissible in accordance with Technical Specifications. However, Technical Specifications required that containment integrity be established within 8 hours. Prior to making the 2C inverter inoperable, no contingency plans were made as to what would be done if the inverter was not restored to operability within 8 hours. After making the inverter inoperable and entering the action statement, the establishment of containment integrity was not initiated because it was expected that the maintenance activity would be completed and the inverter restored to an operable status within the required time frame. However, difficulty was encountered during the process of completing the modifications and restoring the inverter. problems were identified 4 hours into the action statement and at that time it was realized that the inverter would not be restored within the required time frame. Actions were initiated to establish containment integrity at that time; however, integrity was not established within the 8 hours as required by Technical Specifications.

On May 30, 1983, again with the 2A diesel unavailable and inoperable, the normal power supply to the 2C inverter failed, causing a forced transfer to its backup supply. Again 2 AC bus trains were inoperable. The Technical Specifications action statement was entered and both corrective action to restore the inverter to its normal power source and establishment of containment integrity were initiated. However, neither of the actions were completed within the required 8 hours as detailed in Licensee Event Report 50-311/83-22.

Another incident occurred at approximately 1900 on November 2, 1983, during a maintenance shutdown. The 2B 125VDC bus was returned to service following routine battery surveillance testing, and a request was submitted to remove 2C 125VDC bus from service for the same reason. The 2C 125VDC bus was cleared and tagged at 2050 hours. Technical Specification Action Statement 3.8.2.2 was appropriately entered at this time because 2A vital instrument bus was de-energized (for 2A instrument inverter maintenance) and 2C instrument inverter was no longer connected to its respective DC bus. The shift supervisor realized that 2A Vital Instrument bus had apparently been de-energized for some period of time while 2B 125VDC bus was removed from service. Knowing of no action statements in effect due to this situation, an incident report was immediately generated to investigate the potential reportable occurrence. Subsequently, Licensee Event Report No. 83-060/01T was issued to report the incident.

Corrective steps which have been taken and results achieved

An Information Directive was issued to all Operations Department personnel describing the first two events. The Information Directive expressed concern over the failure to establish and implement contingency procedures prior to entering into conditions that could cause a violation of a limiting condition for operation. Additionally, the directive requires that in situations such as the above, planned entry into action statements shall not be made until the additional requirements of the action statements are fulfilled. In cases of unplanned entry into action statements due to events outside our control, immediate actions shall be taken to comply with the action requirements.

As a consequence of the November 28 occurence, the Operations Department has instructed the shift supervisors that during modes 5 and 6, maintenance and/or testing will not be allowed to proceed on more than one bus train at any one time. If it is deemed necessary for any reason to deviate from this policy, containment integrity will be set and then Technical Specification 3.8.2.2 will be entered prior to allowing maintenance and/or testing to proceed on the second bus train.

b. Corrective steps which will be taken to avoid further violations

Same response as answer (a).

Date when full compliance will be achieved C. We are now in full compliance.

Sincerely,

E. A. Liden

Manager - Nuclear

Licensing and Regulation

CC: Director, Office of Inspection and Enforcement Nuclear Regulatory Commission Washington, D.C. 20555

Mr. Donald C. Fischer Licensing Project Manager

Mr. James Linville Senior Resident Inspector